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7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**

9 UNITED STATES OF AMERICA,

10 Plaintiff,

11 vs.

12 BRIAN PATRICK SOLOMON,

13 Defendant.

Case No. 2:24-mj-00786-BNW

CRIMINAL COMPLAINT

VIOLATIONS:

Count One: 18 U.S.C. § 875(c) – Interstate
Communications with Threat to Injure

Count Two: 18 U.S.C. § 2261A(2) –
Cyberstalking

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19 BEFORE the Honorable Brenda Weksler, United States Magistrate Judge, Las
20 Vegas, Nevada, the undersigned Complainant, being duly sworn, deposes and states:
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COUNT ONE

(Interstate Communications with Threat to Injure)

Beginning on or about June 6, 2024, and continuing up to and including on or about September 16, 2024, in the State and Federal District of Nevada,

BRIAN PATRICK SOLOMON,

the defendant herein, unlawfully, willfully, and knowingly, transmitted in interstate commerce communications containing threats to injure Victim-1 and Victim-2, all in violation of Title 18, United States Code, Section 875(c).

COUNT TWO

(Cyberstalking)

Beginning on or about June 6, 2024, and continuing up to and including September 16, 2024,

BRIAN PATRICK SOLOMON

the defendant herein, with intent to harass and intimidate, used an interactive computer service and electronic communications service, and electronic communication systems of interstate commerce, and any other facility of interstate and foreign commerce, specifically online direct messages and postings, to engage in a course of conduct that caused, attempted to cause, and would be reasonably expected to cause substantial emotional distress to Victim-1 and Victim-2, all in violation of Title 18, United States Code, 2261A(2)(B).

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent with the Federal Bureau of Investigation ("FBI") and have been employed in this capacity since September 2021. I previously was a patrol officer in Somersworth, New Hampshire, since October 2017 and prior to beginning my career with the FBI. I am a graduate of Plymouth State University, where I received a Bachelor's Degree in Criminal Justice. In addition, I am a graduate of the FBI's Special Agent Basic Field

1 Training Course in Quantico, Virginia. During this training, I was instructed in all phases of
2 criminal investigations, including, but not limited to, Criminal and National Security Law,
3 Search and Seizure, Field Enforcement Techniques, Firearms Proficiency, Interviewing, and
4 Evidence Collection.

5 2. Throughout my career, I have investigated violations of federal criminal laws,
6 and have gained experience through training, classes, and everyday work related to
7 conducting investigations. I have received training and consulted with senior agents
8 regarding the application for and execution of both search and arrest warrants. Based on my
9 experience, I am familiar with techniques used by persons engaged in a wide variety of
10 criminal activity.

11 3. The facts and information contained in this affidavit are based upon my direct
12 participation in this investigation and based upon facts as relayed to me by other law
13 enforcement officers pertaining to this investigation. This affidavit is submitted for the
14 limited purpose of establishing probable cause for the charged offenses. As a result, I have
15 not included each and every fact known to me regarding this matter.

16 FACTS ESTABLISHING PROBABLE CAUSE

17 4. On or about June 6, 2024, Victim-1, a high level employee of a university in
18 Austin, Texas, discovered persistent threatening communications sent from Instagram
19 (Meta) accounts operated by BRIAN PATRICK SOLOMON ("SOLOMON") to her direct
20 messages on Instagram.

21 5. SOLOMON utilized multiple Instagram accounts to send these
22 communications, to include solomon_christ_word_of_god, queen_mother314,
23 solomon_christ_son_of_heaven, and crispest_on_the_gram.
24

1 6. SOLOMON sent such a substantial volume of messages that Victim-1 was
2 unable to see what date SOLOMON began his communications to her. Statements made
3 from SOLOMON included, but are not limited to, "How about you ask that cunt of a woman
4 [Victim-1] if she feels like killing herself. And you let me know in your next story. Because I
5 could literally kill that bitch right now," "Did you get the fucking picture [Victim-1]. You
6 fucking bitch. How I could kill you with my bare fucking hands right now," and "I would
7 massacre every single one of you and your families for allowing a cunt named [Victim-1] to
8 attend your venue tonight. To everyone that attends that event tonight, I would massacre
9 you and your families for going to that event to meet a cunt of a woman named [Victim-1]
10 tonight".

11 7. Additionally, SOLOMON messaged the Instagram account for Victim-2's
12 daughter's dog and stated, "At least your cunt fucking dog didn't block me. [Victim-2's
13 daughter], you're a fucking cunt. Your father is a fucking cunt. Understand in these moments
14 I would fucking massacre your entire cunt family. I would massacre your cunt fucking coach
15 too. You are literally meek and lowly to me. You mean nothing". The story tagged the
16 Instagram account for Victim-2, another high level employee of the same university in
17 Austin, Texas. The next post by Solomon also tagged Victim-2, which stated, "That's your
18 daughter, [Victim-2] Watch me rape your daughter over and over and over again until I make
19 her kill herself too."

20 8. On September 11, 2024, SOLOMON sent the following direct messages to
21 Victim-1 on Instagram utilizing Instagram account solomon_christ_son_of_heaven: "I could
22 maybe go to Austin" "Still have that warrant" "That fucks with me too." "Hubby don't like
23 jails." "Makes me want to massacre people." and, "Remember this [Victim-1].. I'm going to
24 one of your first 10 games."

1 9. On September 16, 2024, the defendant herein sent the following direct
2 messages to Victim-1 on Instagram utilizing Instagram account
3 solomon_christ_son_of_heaven: “[Victim-1], you are truly a worthless cunt to me. I’ll book
4 my ticket today. I don’t trust you though. I won’t even tell you what hotel I’m going to be
5 at... Again, if I got there and you do not see me. It’s over... So I’m excited to just go out
6 there and get it over with.” “I will even take out some cash for you when I arrive just out of
7 respect for how much of a cunt you are to me.” “I’m flying out there...” “So basically I’m
8 just going through the motions now of playing along with you, then flying to you. And that
9 will be the end of it... Because you are literally the devil to me. And the reason I’m free from
10 your torment of me now Is flying to you is the final all encompassing step for me loving
11 you... So even before flying to you.. Knowing that I’ve finally done it all.. ticket booked and
12 all. I’m finally free from your torment.”

13 10. On May 23, 2024, CashApp user by the name of Brian Solomon, username
14 \$bsolomon1 requested \$200 from Victim-1 via CashApp with the memo “For [airplane
15 emoji]”. On June 5, 2024, a CashApp user with the same identifiers requested \$250 with the
16 memo “For [airplane emoji] to you IG: Solomon_Christ_word_of_God”.

17 11. A records check of SOLOMON revealed an arrest in Austin, Texas, for
18 Burglary of Vehicle and Criminal Mischief on July 26, 2023. Austin, Texas is where the
19 University of Texas at Austin is located, as well as where Victim-1 resided. SOLOMON was
20 also arrested in the State of Nevada for Stalking on February 27, 2024. As a result of his
21 arrest and guilty plea, a protection order was entered against SOLOMON. Service of this
22 protective order warned him against making unsolicited contact to that victim.

23 12. Victim-1 attended the ESPYs in July 2024 and was scheduled for a speaking
24 engagement. SOLOMON communicated to Victim-1 via Instagram that he had purchased

1 a ticket for the event. While the event revoked his ticket due to safety concerns, Victim-1 was
2 nonetheless concerned enough for her own safety that she paid out of pocket to hire security
3 for her time at the ESPYs, to include a car service.

4 13. In direct response to the threats from SOLOMON, Victim-1 moved to a new
5 residence. She was afraid that her previous residence of two years could be located from
6 social media based on scenery around her home, and the University of Texas Police
7 Department informed Victim-1 that SOLOMON had been located in Austin approximately
8 eight miles from her home. Victim-1 has chosen to rent her current residence to prevent her
9 name from being associated with her address in publicly accessible records. Victim-1 only
10 had one camera inside her previous residence. Due to the threats she received from
11 SOLOMON, she has moved to a rental home in a gated community, and installed a complex
12 multi-camera system to monitor her new residence. She has not disclosed her new address
13 to coworkers or friends for fear of her new residence being revealed.

14 14. Based on the public nature of Victim-1's employment and a publicly accessible
15 schedule, in addition to SOLOMON's previous travel to Austin, Texas, and his incessant
16 harassing and threatening communications, Victim-1 has experienced substantial emotional
17 distress at the prospect that SOLOMON will harm her.

18 15. On September 16, 2024, SOLOMON was arrested by FBI agents.
19 SOLOMON was advised of his *Miranda* rights and elected to make a statement to law
20 enforcement without the presence of an attorney. SOLOMON admitted that he used
21 Instagram accounts crispest_on_the_gram, queenmother314, and
22 solomon_christ_word_of_god, among others. SOLOMON admitted that he had sent a few
23 thousand direct messages to Victim-1 and that he had become angry with her. SOLOMON
24 admitted he had requested money on approximately two or three occasions from Victim-1

1 to travel to her. SOLOMON admitted he had traveled via airplane to Austin, Texas, and had
2 been arrested while there. SOLOMON also admitted to sending communications to Victim-
3 2.

4 16. SOLOMON also claimed he and Victim-1 were to be married and that he was
5 the second coming of Christ.

6 CONCLUSION


7 17. Based upon the information set forth in this application, your Affiant
8 respectfully submits that there is probable cause to believe that BRIAN PATRICK
9 SOLOMON violated 18 U.S.C. § 875(c), Interstate Communications with Threat to Injure,
10 and 18 U.S.C. § 2261A(2), Cyberstalking, beginning on or about June 6, 2024, and
11 continuing up to and including on or about September 16, 2024, as described above.

12
13 Respectfully Submitted,

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15
16 Special Agent Connor Mele
Federal Bureau of Investigation

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18 Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by
19 telephone on September 17, 2024.

20 
21 THE HONORABLE BRENDA WEKSLER
22 UNITED STATES MAGISTRATE JUDGE
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